

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES
PRACTICES, AND PRODUCTS
LIABILITY LITIGATION**

MDL NO. 16-2738 (MAS) (RLS)

THIS DOCUMENT RELATES TO ALL CASES

CERTIFICATION OF MICHELLE A. PARFITT, ESQ.

Michelle A. Parfitt, Esq. hereby certifies as follows:

1. I am an attorney at law and senior partner at the law firm of Ashcraft & Gerel. I was appointed as Plaintiffs' Co-Lead Counsel to represent all Plaintiffs in the above-captioned matter.

2. I submit this Certification based on personal knowledge in support of the Plaintiffs' Steering Committee's Motion to Exclude the Opinions of Drs. Mary Poulton and Laura Webb.

3. Attached hereto as Exhibit 1 is a true and correct copy of the Deposition of Mary Poulton, Ph.D., dated March 18, 2019.

4. Attached hereto as Exhibit 2 is a true and correct copy of the Amended Expert Report of Robert B. Cook, Ph.D., dated January 22, 2019.

(FILED UNDER SEAL)

5. Attached hereto as Exhibit 3 is a true and correct copy of the Expert Report of Mark Krekeler, Ph.D., dated November 16, 2018. (*FILED UNDER SEAL*)

6. Attached hereto as Exhibit 4 is a true and correct copy of the Expert Report of Mary Poulton, Ph.D., dated February 25, 2019.

7. Attached hereto as Exhibit 5 is a true and correct copy of the Expert Report of Laura Webb, Ph.D., dated February 25, 2019.

8. Attached hereto as Exhibit 6 is a true and correct copy of the Deposition of Laura Webb, Ph.D., dated March 29, 2019.

9. Attached hereto as Exhibit 7 is a true and correct copy of the Report of Italian Mine Samples (Pooley Report).

10. Attached hereto as Exhibit 8 is a true and correct copy of Exhibit 14 (letter dated August 6, 1971) from the Deposition of Mary Poulton.

11. Attached hereto as Exhibit 9 is a true and correct copy of Bates Number JNJ000087868 (Progress Report on Studies of the Physical Properties of Talc, Their Measurement, and Comparison).

12. Attached hereto as Exhibit 10 is a true and correct copy of Exhibit 28 (Rio Tinto 2008 Annual Report) from the Deposition of Mary Poulton.

13. Attached hereto as Exhibit 11 is a true and correct copy of Exhibit 22 (letter dated May 21, 1987) from the Deposition of Mary Poulton.

14. Attached hereto as Exhibit 12 is a true and correct copy of Exhibit 23 (letter dated April 14, 1971) from the Deposition of Mary Poulton.

15. Attached hereto as Exhibit 13 is a true and correct copy of Stanley, C., *The Fundamental Relationship between Sample Mass and Sampling Variance in Real Geological Samples and Corresponding Statistical Models*, Exploration and Mining Geology, 2007;16(1-2):109-123.

16. Attached hereto as Exhibit 14 is a true and correct copy of Bates Number IMERYYS 081025 (Talc Geology, Mining and Processing for Cosmetic, Pharma and Food Applications PowerPoint).

17. Attached hereto as Exhibit 15 is a true and correct copy of Exhibit 18 (Activities Supporting Opinions checklist) from the Deposition of Laura Webb.

18. Attached hereto as Exhibit 16 is a true and correct copy of Exhibit 28 (Chart) from the Deposition of John Hopkins.

19. Attached hereto as Exhibit 17 is a true and correct copy of Exhibit 12 (Interoffice Correspondence dated March 25, 1992) from the Deposition of Laura Webb.

20. Attached hereto as Exhibit 18 is a true and correct copy of Exhibit 13 (Interoffice Correspondence dated May 21, 1992) from the Deposition of Laura Webb.

21. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I may be subject to punishment.

Dated: July 23, 2024

/s/ Michelle A. Parfitt
Michelle A. Parfitt